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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FUJIAN JINHUA INTEGRATED CIRCUIT  
CO., LTD,

Defendant.

CASE NO. 18-CR-00465 MMC

JOINT PROPOSED JURY QUESTIONNAIRE

The Honorable Maxine M. Chesney  
Pretrial Conf: January 18, 2022, at 10:00 am  
Courtroom 7, 19<sup>th</sup> Floor

1 The United States and Defendant Fujian Jinhua Integrated Circuit Co., Ltd., jointly respectfully  
2 submit the attached proposed jury questionnaire for consideration by the Court. If adopted, the parties  
3 propose that the questionnaire be sent to the venire in time for the potential jurors to complete the  
4 questionnaire and return it to the Court for review by the parties prior to jury selection.

5 The parties anticipate discussing logistics involving the jury questionnaire with the Court at the  
6 Pretrial Conference.

7  
8 DATED: January 4, 2022

Respectfully submitted,

9  
10 STEPHANIE M. HINDS  
United States Attorney

11  
12 /s/  
LAURA VARTAIN HORN  
13 NICHOLAS WALSH  
14 Assistant United States Attorneys

15 NICHOLAS O. HUNTER  
16 STEPHEN MARZEN  
Trial Attorneys, National Security Division

17 DATED: January 4, 2022

Respectfully submitted,

18 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
19

20 /s/  
JACK P. DICANIO  
21 MATTHEW E. SLOAN  
22 EMILY A. REITMEIER  
23 Attorneys for Defendant  
Fujian Jinhua Integrated Circuit Co. Ltd.

Juror Number \_\_\_\_\_

## **JUROR QUESTIONNAIRE**

### **To Prospective Juror:**

You are being considered for the jury in a criminal case entitled *United States v. Fujian Jinhua Integrated Circuit, Co., Ltd.* (referred to as “Jinhua” in this document).

In this case, the government alleges that Jinhua engaged in intellectual property crimes. Jinhua denies this allegation. If you are selected for this jury, you will receive more information about the specific charges in the case

Please complete the following questionnaire to assist the attorneys and me in selecting a jury to serve in this case. By using this questionnaire, we will not need to ask all these questions in court.

Please answer the questions honestly, completely, and with great care. There are no right or wrong answers. The responses will be reviewed by only for the purpose of selecting a jury.

While some of the questions may seem very personal, I have reviewed them carefully and determined that they are relevant to the issues in this case. The questions are not meant to invade your privacy but to help select a fair jury. If there is sensitive personal information that you wish not to disclose in front of the other jurors, please write "private" in your response. If the attorneys need to follow up with you about a private response, the attorneys and I will speak to you outside of the presence of other jurors.

Please write clearly, and do not leave questions blank. If a question does not apply to you in any way, write “N/A” (for “not applicable”), rather than leaving the response blank. If you do not understand the question, please write that in the space for the answer.

If you need more space for your response or want to make further comments about any question, please use the extra sheets at the end of the questionnaire. Do not write on the back of any page.

You are ordered not to discuss this case or questionnaire with anyone, including your family and fellow jurors. Do not do any research, such as searching for information on the internet, related to the case or any of the people or issues involved.

You are expected to sign the questionnaire, and your answers will be treated the same as if they were made in court under oath.

Thank you for your important service as a prospective juror.

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THE HON. MAXINE M. CHESNEY  
UNITED STATES SENIOR DISTRICT JUDGE

Juror Number \_\_\_\_\_

### JUROR QUESTIONNAIRE

1. Name: \_\_\_\_\_ Age: \_\_\_\_\_
  
2. Residence: City/Town: \_\_\_\_\_  
 How long have you lived at that location? \_\_\_\_\_  
 Do you own or rent your home?      Rent \_\_\_\_\_ Own \_\_\_\_\_ Other \_\_\_\_\_  
 What other cities or towns have you lived in during the last ten years?  
 \_\_\_\_\_  
 \_\_\_\_\_
  
3. Where were you born? \_\_\_\_\_
  
4. Do you have any trouble understanding English?  
 Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, please explain:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
  
5. What is your marital status? (please circle)  
 Single    Married    Separated    Divorced    Widowed    Live with a partner
  
6. What is your current job status?  

_____ Working full-time	_____ Unemployed
_____ Working part-time	_____ Homemaker
_____ Retired	_____ Full-time student
_____ Disabled	
  
7. Occupation:
  - a. What is your occupation? (Or what was it, if you are not currently employed?)  
 \_\_\_\_\_
  - b. Who is your employer? (Or, if you're not currently employed, who was your employer?)  
 \_\_\_\_\_
  - c. How long have you worked there? (Or, how long did you work there?) \_\_\_\_\_
  - d. Briefly describe your job responsibilities. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
  - e. Do or did you supervise other people? Yes \_\_\_\_\_ No \_\_\_\_\_ If so, how many? \_\_\_\_\_

Juror Number \_\_\_\_\_

8. List the jobs you've had over the last 10 years, by occupation and employer.

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9. Have you ever worked in a job that involved computer chips or semiconductors?

If yes, please describe:

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10. What is the highest level of education you have completed?

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11. Please list the schools you've attended, starting with high school:

School name

Area(s) of study

Degree(s) received

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12. Have you taken any courses in law, legal procedure, or administration of justice?

If yes, please describe:

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Please complete the next question about your **spouse** or **partner**. If you are widowed, divorced, or separated, please answer the following question about your **former spouse/partner**.

13. Current employment status:

\_\_\_\_\_ Working full-time

\_\_\_\_\_ Unemployed

\_\_\_\_\_ Working part-time

\_\_\_\_\_ Homemaker

\_\_\_\_\_ Retired

\_\_\_\_\_ Full-time student

\_\_\_\_\_ Disabled

- a. What is his/her occupation (or what was it, if retired, unemployed, or disabled)?

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- b. By whom is (was) s/he employed? \_\_\_\_\_

- c. How long has (did) s/he worked there? \_\_\_\_\_

- d. What other types of jobs has s/he had in the past 10 years? \_\_\_\_\_

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Juror Number \_\_\_\_\_

14. What are your parents' and/or stepparents' occupations? (If retired or deceased, what did they do most recently before retirement?)

Mother: \_\_\_\_\_ Father: \_\_\_\_\_

Stepmother: \_\_\_\_\_ Stepfather: \_\_\_\_\_

15. If you have children, please state (without providing their names):

<u>Sex</u>	<u>Age</u>	<u>Highest Level of Education</u>	<u>Occupation</u>
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_____
_____
_____

16. If other adults live in your home in addition to those already you already described above, please state (without providing their names):

<u>Relationship</u>	<u>Sex</u>	<u>Age</u>	<u>Highest Level of Education</u>	<u>Occupation</u>
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_____
_____
_____

17. Have you, your current spouse/partner, or your child ever served in the military?

Yes \_\_\_\_ No \_\_\_\_

If yes, please list for: 

<u>You</u>	<u>Spouse, Partner or Child</u>
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Branch of service: \_\_\_\_\_

Combat: Yes \_\_\_\_ No \_\_\_\_ Yes \_\_\_\_ No \_\_\_\_

Military Police or Military Court: Yes \_\_\_\_ No \_\_\_\_ Yes \_\_\_\_ No \_\_\_\_

18. Please list your main sources of news—including newspapers, television and radio stations or programs, internet sites, and conversations with others.

_____
_____
_____

Juror Number \_\_\_\_\_

19. Have you served as a trial juror in the past? Yes \_\_\_\_ No \_\_\_\_

If yes, please complete for each case on which you served:

	Civil or Criminal	Nature of case (robbery, personal injury, etc.)	When/Where?	Did the jury reach a verdict? (yes or no – don't say what the verdict was)
1				
2				
3				
4				

- a. Have you ever served as a jury foreperson? Yes \_\_\_\_ No \_\_\_\_
- b. Have you ever served as a grand juror? Yes \_\_\_\_ No \_\_\_\_
- c. Is there any reason that your prior jury service would affect your ability to be fair, objective, and impartial to both sides at trial? Yes \_\_\_\_ No \_\_\_\_
- d. If Yes, please explain:

\_\_\_\_\_

\_\_\_\_\_

20. Have you or any close friends or family members ever worked for a court, a prosecutor's office, or a criminal defense attorney's office? This includes a judge, a District Attorney's office, a United States Attorney's office, or any private or public criminal defense attorney's office.

Yes \_\_\_\_ No \_\_\_\_ If Yes, please list:

Name                      Relationship to you                      Position                      Employer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

21. Have you or any close friends or family members ever been employed by or affiliated with a law enforcement agency (including police, sheriff, jail, prison, Immigration, IRS, parole, or probation)?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please list:

Name                      Relationship to you                      Position                      Agency

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Juror Number \_\_\_\_\_

22. Have you or anyone close to you ever been the victim or witness of a crime, including intellectual property crimes, domestic violence, assault, identity theft, fraud, etc. (whether it was reported or not)?

Yes \_\_\_\_ No \_\_\_\_

If Yes, please explain:

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23. Have you ever appeared in any court proceeding in a case as a plaintiff, defendant, victim, or witness for any reason other than stated above?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please state when and explain why you appeared in court:

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24. Have you, any member of your family, or any close friends ever been arrested?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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25. Have you, or a close friend or family member, ever had a positive or negative experience with a law enforcement officer or agency, state agency, federal agency, or a state or federal government that could influence your ability to judge the facts of a criminal case or the person accused?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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26. Have you, any relatives, or close friends:

a. Any knowledge of the law of trade secrets, copyrights, or patents?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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Juror Number \_\_\_\_\_

b. Had any involvement in any dispute involving trade secrets, copyrights, or patents?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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c. Ever considered filing for a patent or trademark?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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27. Have you, any relatives, or close friends (or a company you or they were working for if you or they were involved in the dispute) ever been involved in a business dispute with another person or company?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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28. Have you, any member of your family, or any of your close friends ever worked for, been in litigation with, or done business with Micron Technology, Inc., or its employees?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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29. Have you, any member of your family, or any of your close friends ever worked for, been in litigation with, or done business with United Microelectronics Corporation or its employees?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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Juror Number \_\_\_\_\_

30. Have you, any member of your family, or any of your close friends ever worked for, been in litigation with, or done business with the defendant, Fujian Jinhua Integrated Circuit, Co., Ltd. (“Jinhua”), or its employees?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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31. This case involves allegations of conspiracies to commit theft of intellectual property. Do you have any views about the ownership or protection of intellectual property that would make it difficult for you to be fair to either the government or the defendant in this case?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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32. This case involves allegations involving the unlawful possession of intellectual property for the benefit of the People’s Republic of China (commonly known as China). Is there anything about the nature of the charges that would make it difficult for you to be fair either to the government or the defendant in this case?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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33. Is there anything about your experiences, opinions, or beliefs about the People’s Republic of China (commonly known as China), that could influence your ability to judge the facts of this criminal case or the accused?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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Juror Number \_\_\_\_\_

34. Have you, any member of your family, or any of your close friends ever lived in or been a citizen of the People's Republic of China (commonly known as China)?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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35. Is there anything about your experiences, opinions, or beliefs about the Republic of China (commonly known as Taiwan) that could influence your ability to judge the facts of this criminal case or the accused?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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36. Have you, any member of your family, or any of your close friends ever lived in or been a citizen of the Republic of China (commonly known as Taiwan)?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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37. Is there anything about your experiences, opinions, or beliefs about race, color, immigration status, national origin, ethnicity, sex, or sexual orientation that could influence your ability to be fair to either the government or the defendant in this case?

Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain:

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Juror Number \_\_\_\_\_

38. Is there anything else about your experiences, opinions, or beliefs, whether religious, moral, ethical, or philosophical, that could influence your ability to judge the facts in a criminal case?

Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, please explain:

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39. Does the nature of the charges in this case cause you any difficulties such that you feel you could not be a juror in this case, or that you could not be a fair and impartial juror to both sides?

Yes \_\_\_\_\_ No \_\_\_\_\_ If No, please explain:

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40. The trial in this case is estimated to last approximately 6 to 7 weeks, at which point the jury will begin deliberating. The trial begins on February 14, 2022, and continues Monday through Thursday, beginning each day at 9:00 a.m. and finishing around 4:00 p.m. Do you have any serious and specific problems that would prevent you from serving as a juror in this case?

Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, please explain:

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41. Is there anything not covered by this questionnaire that should be brought to the attention of the judge and lawyers because it might affect your ability to be a fair and impartial juror?

Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, please explain:

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42. A list is attached to this questionnaire ("Attachment A"). Please circle the name of any of the people that you personally know. And please complete the Juror's Oath below.

#### **JUROR'S OATH**

I declare under penalty of perjury that the answers in this Juror Questionnaire are true and correct to the best of my knowledge and belief.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_



Juror Number \_\_\_\_\_

**ATTACHMENT A**

1. Kevin Caranna
2. Nicholas Garcia
3. Cynthia Ho
4. Letitia Wu
5. Pei-shan Chang
6. Wei-ting Chiang
7. Chih-hsuan Chien
8. Eric Mao-yi Chen
9. Leo Yuren Lee
10. Shi-Jie Lin
11. Frank Pan
12. Hsing-hung Wu
13. An-yi Xu
14. Terry Acker
15. Steven Chen
16. Scott DeBoer
17. D. Mark Durcan
18. Hideki Gomi
19. Jonathan S. Heller
20. Greg Schow
21. J.R. Tietsort
22. Yanbin Wang
23. C.S. Chang
24. J.C. Cho
25. Chou Hsinghung also known as Hsin Hong Chou also known as H.H. Chou
26. Huang Shuhan also known as Emily Huang
27. Wei Hsin Kao
28. Bangming Wang also known as Pang Ming Wan
29. Jennifer Wang
30. Melissa Anderson
31. Corning Painter
32. Brian Trafas
33. Michael Yu
34. Jonathan Joe
35. Gary D. Conner
36. Nancy Shum
37. Kasie Cheung
38. Jessie Liu
39. Yongmei Liu
40. Amanda Peeters
41. Richard Shek
42. Michael Bandemer

Juror Number \_\_\_\_\_

43. Andy Crain
44. Yu-Fan Chiu
45. Terry Daly
46. Tom Dyer
47. Adam Segal
48. Hsu Huai-wen
49. Chen Zhengkun also known as Stephen Chen
50. He Jianting also known as J.T. Ho
51. Wang Yungming also known as Kenny Wang
52. Laura Vartain Horn
53. Nicholas Walsh
54. Nicholas Hunter
55. Stephen Marzen
56. Jack P. Dicanio
57. Matthew E. Sloan
58. Emily Reitmeier
59. Lu Wensheng
60. Wu Junsheng
61. Zheng Jinfu
62. You Zhenfu also known as Yu Chen Fu
63. Wu Kunrong
64. Ying Zonghua
65. Xiao Xinhuang
66. Peng Wenquan
67. Woodward Yang
68. John Ashley
69. Jiang Ying
70. Eugene Barash